

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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) Chapter 11

) Case No. 22-10584 (CTG)

) (Jointly Administered)

) **Docket Ref. Nos. 406, 499**

**NOTICE OF SUCCESSFUL BIDDER AND CANCELLATION OF AUCTION**

**PLEASE TAKE NOTICE** that on September 7, 2022, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) a motion [Docket No. 406] (the “Motion”)<sup>2</sup> seeking entry of an order (the “Bidding Procedures Order”), approving Bidding Procedures, scheduling an auction of the Assets (the “Auction”), and granting other related relief.

**PLEASE TAKE FURTHER NOTICE** that on September 29, 2022, the Court entered the Bidding Procedures Order [Docket No. 499]. In accordance with the Bid Procedures Order, the Debtors scheduled an Auction for October 25, 2022, at 10:00 a.m. (prevailing Eastern Time). At the Bid Deadline, the Debtors received only one Qualified Bid for their Assets.

**PLEASE TAKE FURTHER NOTICE** that the Debtors have declared LVS II SPE XXXIV LLC and/or its designee, including an affiliate formed for purposes of taking title to the Assets, the Successful Bidder for certain of the Debtors’ Assets (the “Purchased Assets”) identified in **Exhibit A** attached hereto.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the terms of the Bidding Procedures Order, the Debtors have canceled the Auction.

**PLEASE TAKE FURTHER NOTICE** that the Debtors will seek approval of the Sale of the Purchased Assets at a hearing (the “Sale Hearing”) scheduled to commence on **October 31, 2022, at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, Wilmington, Delaware 19801. The Sale Hearing may be adjourned or rescheduled by the Debtors, in consultation with the Committee and the

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

<sup>2</sup> Capitalized terms used but not defined herein shall have the respective meanings ascribed to such terms in the Motion or the Bidding Procedures, as applicable.

Successful Bidder, to a time and date consistent with the Court's calendar, as set forth in notice on the docket of these Chapter 11 Cases, a notice of agenda, or stated orally at the Sale Hearing.

Dated: October 24, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Mary F. Caloway

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